

**UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF MISSOURI  
EASTERN DIVISION**

In Re:	)	
	)	
DEBORAH HEACOCK	)	Case No. 14-41359-399
	)	Chapter 13
Debtor.	)	Loc. No. 07F320402
	)	Claim No. 14-1
	)	Amount: \$2,300.02

**CREDITOR'S RESPONSE TO DEBTORS' OBJECTION TO CLAIM No. 14-1  
FILED BY ST. LOUIS COUNTY COLLECTOR OF REVENUE**

COMES NOW Creditor, Collector of Revenue for St. Louis County, Missouri by and through his attorney, and states in response to Debtors' Objection to Claim No. 14-1:

1. Creditor, Collector of Revenue, represents St. Louis County, Missouri, which is a political subdivision of the State of Missouri.
2. The Debtor Deborah Heacock is the owner of record of the property known and numbered 12257 Benham Road and further identified by Locator Number 07F320402.
3. Real property taxes for the years 2011 – 2014 are unpaid.
4. On January 29, 2015, St. Louis County filed its Claim 14-1 for 2014 real property taxes owed.
5. To date, the real property remains in the name of the Debtor and there is no indication as to when and to whom the property will be surrendered and if the party will accept the property as its own and pay the real property taxes owed.
6. Until the property is surrendered by the Debtor, Creditor asks this Court to overrule Debtor's Objection and order payment of the debt accordingly.

WHEREFORE, Creditor prays this court enter an Order overruling Debtor's Objection to Claim No. 14-1 and allow Creditor's Claim No. 14-1 in the amount of \$2,300.02 for such and further relief as this court deems just and proper.

PETER J. KRANE  
ST. LOUIS COUNTY COUNSELOR

By: s/ Robert E. Fox, Jr.  
Robert E. Fox, Jr. MO27103  
Associate County Counselor  
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Clayton, MO 63105  
(314) 615-7042  
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**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that a true and correct copy of the foregoing was mailed February 11, 2015, to:

John Labarge, Jr.  
Chapter 13 Trustee  
P.O. Box 430908  
St. Louis, Missouri 63143

Kim H. Baro  
1605 N. Lindbergh Blvd.  
Florissant, Missouri 63031

s/s/ Robert E. Fox, Jr.  
Robert E. Fox, Jr.